

1 DENNIS M. PRINCE  
Nevada Bar No. 5092  
2 KEVIN T. STRONG  
Nevada Bar No. 12107  
3 **PRINCE LAW GROUP**  
4 10801 West Charleston Blvd, Suite 560  
Las Vegas, NV 89135  
5 P: (702) 534-7600  
6 F: (702) 534-7601  
Email: [eservice@thedplg.com](mailto:eservice@thedplg.com)  
7 Attorneys for Plaintiff  
8 *Renee Jenkins*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 RENEE JENKINS, an Individual,  
12  
13 Plaintiff,

14 v.

15 PRIME WASHINGTON, LLC, d/b/a  
16 CORNERSTONE CROSSINGS  
APARTMENTS, a Delaware limited  
17 liability company; PRIME  
ADMINISTRATION, LLC, d/b/a PRIME  
18 GROUP, a Delaware limited liability  
company; PAULETTA DEARINGER, an  
19 individual; ROE PROPERTY  
20 MANAGEMENT COMPANY; ROE  
PROPERTY MANAGER; DOES I-X; and  
21 ROE BUSINESS ENTITIES XI-XX,  
22 inclusive,

23 Defendants.

CASE NO.: 2:20-CV-00653-JCM-DJA

**STIPULATION AND  
ORDER, FOR EXTENSION OF  
TIME TO FILE AN OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS PLAINTIFF'S  
COMPLAINT**

**(First Request)**

24 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff RENEE  
25 JENKINS, through her counsel of record, Dennis M. Prince and Kevin T. Strong of  
26 PRINCE LAW GROUP, and Defendants PRIME WASHINGTON, LLC, d/b/a  
27 CORNERSTONE CROSSINGS APARTMENTS, PRIME ADMINISTRATION, LLC,  
28



d/b/a PRIME GROUP, and PAULETTA DEARINGER, by and through their counsel of record, Rachel J. Holzer of TYSON & MENDES LLP, that the deadline for Plaintiff to file her Opposition to Defendants' Motion to Dismiss Plaintiff's Complaint Pursuant to FRCP 12(b)(6) (ECF No. 6) shall be extended by seven (7) days, from April 27, 2020 to May 4, 2020. The Motion was filed on April 13, 2020. This is the first stipulation for extension of time to file Plaintiff's opposition to Defendants' motion. This Stipulation and [Proposed Order] is submitted in accordance with LR IA 6-1.

Good cause exists to grant the parties' stipulation. Specifically, Plaintiff's counsel, Prince Law Group, filed its notice of association on April 24, 2020. (ECF No. 10). Prince Law Group will file a Substitution of Counsel once the necessary signatures are obtained. As Defendants have made clear in their Motion to Dismiss, there are complex procedural matters that require a complete review of the pleadings and procedural history in this matter. Plaintiff's counsel requires additional time to review the record to more fully understand the aforementioned procedural matters and prepare an appropriate opposition to Defendants' Motion to Dismiss. This additional time will also provide the Plaintiff more time to fully and properly apprise the Court of the legal issues in this matter.

There are currently no scheduled hearings in this case. A short extension to file an opposition will not unduly delay the proceedings, nor adversely affect or prejudice the parties. This request is not being made in bad faith, but to allow Plaintiff's counsel time to review the pleadings in this case, and other related cases, in order to properly

///

///

///

///

///

///



1 respond to Defendants' Motion. Therefore, the parties respectfully request this Court  
2 to approve the foregoing stipulation.

3  
4 DATED this 24th day of April, 2020.

DATED this 24th day of April, 2020

5 **PRINCE LAW GROUP**

**TYSON & MENDES, LLP**

6 /s/ Dennis M. Prince

/s/ Rachel J. Holzer

7 DENNIS M. PRINCE

RACHEL J. HOLZER

8 Nevada Bar No. 5092

Nevada Bar No. 11604

9 KEVIN T. STRONG

3960 Howard Hughes Parkway, Suite 600

10 Nevada Bar No. 12107

Las Vegas, Nevada 89169

10801 W. Charleston Boulevard, Suite 560

Attorneys for Defendants

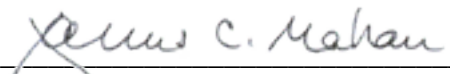
Las Vegas, Nevada 89135

Attorneys for Plaintiff

11  
12 **ORDER**

13 **IT IS SO ORDERED.**

14 DATED April 27, 2020.

15  
16   
UNITED STATES DISTRICT JUDGE

